

## Instructions for Completing the Official National Response Framework Comment Form



Please use this form to submit comments on the base document, annexes, and partner guides. Copies of these items can be found at [www.fema.gov/nrf](http://www.fema.gov/nrf).

Submit a completed comment form through your agency's official channels. Each agency should provide a single consolidated form to: [fema-nrf@dhs.gov](mailto:fema-nrf@dhs.gov) no later than **Noon on Monday October 22, 2007**. Note: Due to the high volume of comments anticipated, use of this comment form is imperative - comments not submitted in this format may not be incorporated.

### How to Fill Out The Form:

**Organization:** Indicate the organization from which comments are being submitted.

**POC Name and Contact Info:** Include name, phone and email. Should be name of person who can answer questions.

**Document:** Indicate the document to which the comment applies (i.e. base document, name of annex or name of partner guide)

**Page:** Indicate the page number (s) on which the change is required.  
(If the change is on more than one page, please use the following format: 44-45. For general comments not corresponding to a specific page, enter GEN)

**Line:** Indicate the line number(s) on which the change is required.  
(If the change is on more than one line, please use the following format: 44-45)

**Category:** Indicate the type of comment; choices of categories include:  
**C – Critical** (Contentious issue that will cause non-concurrence with publication)  
**S – Substantive** (Factually incorrect material)  
**A – Administrative** (Grammar, punctuation, style, word-smithing etc.)

**Comment:** Indicate your comment and explain the rationale.

**Recommended Solution Language:** Provide recommended language to resolve your comment. For example, if the comment is pertaining to a missing reference to Topic XYZ, please provide the language on that topic.

**Extra Rows:** If you require additional rows within the table, you can insert new rows using the Table Menu or you can hit the Tab Key at the end of your last row.

**Submitting the comments:** Delete the instruction page leaving just the form. Save the document as a different name and email to [fema-nrf@dhs.gov](mailto:fema-nrf@dhs.gov) no later than **Noon on Monday October 22, 2007**.

## Draft National Response Framework Comment Form – September 2007

Each organization should provide a single consolidated comment form to: [fema-nrf@dhs.gov](mailto:fema-nrf@dhs.gov) **no later than NOON on October 22, 2007.**

<b>Organization Name: Delaware Emergency Management Agency</b> <b>POC Name and Contact Information: Jamie Turner, Director    <a href="mailto:Jamie.Turner@state.de.us">Jamie.Turner@state.de.us</a></b>					
DOCUMENT (NRF, Annex, etc.)	PAGE	LINE	CATEGORY C = Critical S = Substantive A= Admin	COMMENT	RECOMMENDED SOLUTION LANGUAGE (Include a proposal for change)
NRF	5	39	S	NRF indicates that the Framework is always in effect, yet indicates that it can be implemented at any level at any time. This statement appears to be confusing.	This should include how a Governor requests NRF full or partial implementation.
NRF	7	29	A	Change “rapidly to” to “to rapidly”.	Grammatical change
NRF	10	29-36	S	This area needs clarification or needs to be reworded regarding military chain-of-command vs. unity of command	Suggest a separate heading/paragraph be added and addressed as an exception to the command structure. DOD assets by law report to the SECDEF & not DHS. While the military does follow a chain of command all the other public safety services do also (police, fire, EMS). While the military will be taking direction down their chain of command they still need a representative in the “unified command” to understand what everyone else is doing and what the military needs to accomplish and pass that to the military. These sentences make it sound as if the military won’t be part of the “unified command”.
NRF	11	36	C	“prevent and disrupt” is mentioned here but the “disrupt” part isn’t address.	Add information on disruption expectations and or examples
NRF	20	4-5	S	Incorrectly states that communities requiring resources beyond what the State	1. See Robert T Stafford Act requirements. Requests for assistance, coordination, and or support are

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				can provide, may request directly from the Federals. This request should come from the State	channeled through the State Coordinating Officer in the EOC, IOF, or JFO to staff for review and disposition. In the event that state resources are not available, discussion with the FCO is held to provide disposition for the request. The NRF documents that states must use all resources and mutual aid before federal intervention is requested. There is no stipulation in the Stafford Act or other disaster law that mandates this. With FEMA/DHS proactive stance for “known notice events,” their procedures indicate intervention 120 + hours pre-impact. FEMA’s action, the NRCC’s and RRCC’s roles in the NRF are minimal. Emergency Management agencies routinely coordinate their requests through the RRCC and NRCC many times throughout an emergency. Also, regional & national calls are coordinated through the NRCC with impacted and/or all states during the emergency.
NRF	37	35-50	S	Need to clarify Governor’s authority under Title 10 and 32.	Governor can order the Guard to duty without Sec of Defense approval. This particular segment should be expanded and coordinated with the Adjutant Generals and National Guard Bureau
NRF	39	13-32	C	Compare. “Presidential major disaster declaration” and “Federal disaster” are used for the same type event. Use the same term.	Line 22 – change to – “a Governor may request a Presidential major disaster or emergency declaration”. The document must identify that Stafford Act declarations by the President may be declared for other reasons than natural disasters, based on state requests channeled through the FEMA Management Structure.
NRF	Entire			The documents refer to numerous other	Operationally, it would be extremely beneficial to

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	Docum ent			planning documents, annexes, and resources currently housed on a web site.	have a notice distributed to all concerned levels announcing updates to specific documents. Use of the Internet during Preparedness and Response activities, at all levels, predicate facilities having all pertinent plans, annexes, and other written resources on site in the event of internet accessibility delays or failures.
NRF	Entire Docum ent			State and local emergency operations contingency plans are updated either on an annual or biannual basis.	The updates incorporate changes identified, implemented, and practiced on a national level. In the event of annual National Response Plan/NRF updates, states and locals will be operating in a potential vacuum for planning, training, exercising, and the plan review process.
NRF/Overview	56	Table 1	S	The NRF must reflect general parameters and associated requirements to be addressed from the local, state, and up through the national level. Additional information on information flow and mission taskings should be expanded. The expansion of this segment will avoid duplication of effort and resources.	The overview portion of the document should be incorporated within the NRF. Specifically, in the NRF, page 56, Table 1, should be deleted. The ESF descriptions in the Overview document should be substituted in lieu of the table. This provides the State and Local Policy makers with scope of work summaries for the federal ESF, Primary and Supporting agencies assigned to the specific function
NRF/Overview	Added paged		S	The Support Annex summary should also be included in the NRF.	This provides the final portion of the documents which illustrates how local, non-governmental agencies/organizations, private sector, volunteer

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					organizations, states, and our federal partners coordinate and jointly implement these important functional processes.
NRF	61	1	S	The document uses an illustration of the EOC cohabiting with a Joint Field Office. The actual procedure is agreed to by the Federal Coordinating Officer (FCO), the State Coordinating Officer (SCO), and the Governor's Authorized Representative (GAR), with agreement and approval of both FEMA & State Chain of Commands.	This transition normally occurs in the Recovery phase of an incident. The FCO, Emergency Response Team Advanced (ERT-A), or IMAT are integrated within the EOC, the EOC back-up facility, or at an Initial Operating Facility (IOF).
NRF	64	6	S	PFO should not be interfacing with "local jurisdictional officials" below the State level.	The PFO's to date, have stressed their roles in visits emphasizing their informational roles, from state policy makers through the federal policy maker levels. They have no command jurisdiction at a JFO, IOF, or at an EOC, other than information dissemination and determining priorities of scarce federal resource allocations during an incident.

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